

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

GENEVA REED-VEAL, Individually &)
as Mother &Independent Administrator of the Estate))
of SANDRA BLAND, deceased,)

Plaintiff,)

v.)

No. 4:15-cv-02232
Judge David Hittner

BRIAN ENCINIA, Individually and as an agent)
and/or employee of TEXAS DEPARTMENT OF)
PUBLIC SAFETY; ELSA MAGNUS, Individually)
and as an agent and/or employee of WALLER)
COUNTY SHERIFF'S OFFICE; OSCAR)
PRUDENTE, Individually and as an)
agent and/or employee of WALLER COUNTY)
SHERIFF'S OFFICE; and WALLER COUNTY;)
RAFAELZUNIGA, Individually and as an agent)
and/or employee of WALLER COUNTY)
SHERIFF'S OFFICE; MICHAEL)
SERGIS, Individually and as an agent and/or)
employee of WALLER COUNTY SHERIFF'S)
OFFICE; DORMIC SMITH, Individually and as an)
agent and/or employee of WALLER COUNTY)
SHERIFF'S OFFICE; CYNTHIA WHIDDEN,)
Individually and as an agent and/or employee)
of WALLER COUNTY SHERIFF'S OFFICE;)
MARC LANGDON, Individually and as an agent)
and/or employee of WALLER COUNTY)
SHERIFF'S OFFICE; LT. SHERRY ROCHEN,)
Individually and as an agent and/or)
employee of WALLER COUNTY SHERIFF'S)
OFFICE; ASST. CHIEF LANNY THIBODEAUX,)
Individually and as an agent and/or employee of)
WALLER COUNTY SHERIFF'S OFFICE;)
MATTHEW MILLS, Individually)
and as an agent and/or employee of WALLER)
COUNTYSHERIFF'S OFFICE; MARIANNE)
WILLIAMS, Individually and as an agent and/or)
employee of WALLER COUNTY SHERIFF'S)
OFFICE; RANDY LEWIS, Individually and as an)
agent and/or employee of WALLER COUNTY)
SHERIFF'S OFFICE)

Defendants.

**PLAINTIFF'S MOTION FOR AN EXTENSION OF TIME TO RESPOND
TO DEFENDANTS, MARC LANGDON'S, LANNY THIBODEAUX'S,
MARIANNE WILLIAMS', SHERRY ROCHEN'S AND RANDY LEWIS'
MOTION FOR SUMMARY JUDGMENT**

Now comes the Plaintiff, Geneva Reed-Veal, individually and as Mother & Independent Administrator of the Estate of SANDRA BLAND, deceased, and moves this Honorable Court for an extension of time in order to adequately respond to motions for summary judgement filed by Defendants, Marc Langdon, Lanny Thibodeaux, Marianne Williams, Sherry Rochen and Randy Lewis and in support of her motion, Plaintiff states the following:

1) On or about March 2, 2016 Defendants Marc Langdon, Lanny Thibodeaux and Marianne Williams filed their motion for summary judgement and on March 18, 2016 Defendants, Sherry Rochen and Randy Lewis filed a motion for summary judgement as well.

2) On March 22, 2016 this Honorable Court set Plaintiff's response deadline for April 22, 2016. (See Ex. 1; Doc. #97).

3) On or about March 25, 2016 Plaintiff's counsel received the Texas Ranger Report from the F.B.I. and, given its volume, did not complete a review of the same until on or about April 3, 2016.

4) Now that Plaintiff's counsel has reviewed the Texas Ranger Report that purports to have oral statements from Defendants, Rochen, Lewis and Williams, Plaintiff's counsel has issued subpoenas for said defendants and will further need to depose Defendants, Langdon and Thibodeaux as said defendants have attached affidavits in support of their respective motions for summary judgement.

5) Before having the occasion to review the Ranger Report, Plaintiff's counsel did not have the identity of those who had provided statements to investigators nor did Plaintiff's counsel know the content or subject matter those statements obtained by the Texas Ranger who generated said report.

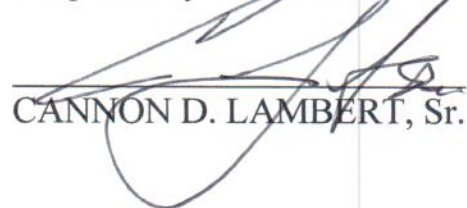
6) Plaintiff's counsel had to wait to review the Ranger's Report to avoid blindly deposing Defendants without knowing what prior statements they may have made.

7) Defendants motions for summary judgement are premature given that no oral discovery has been completed to date as a consequence of the parties not having access to the aforementioned Ranger Report.

8) While Plaintiff expects to be able to complete the depositions of the Defendants, Marc Langdon, Lanny Thibodeaux, Marianne Williams, Sherry Rochen, Randy Lewis, Magnus, Prudente along with the other named Waller County Defendants by the end of July 2016, it is probable that additional information will flow from the testimony given by said defendants which, in turn, may warrant further discovery.

Wherefore, Plaintiff requests this Honorable Court vacate its March 22, 2016 Order (Document 97) and enter an Order allowing Plaintiff to respond to Defendants, Marc Langdon's, Lanny Thibodeaux's, Marianne Williams', Sherry Rochen's and Randy Lewis' motion for summary judgement on or before July 29, 2016. Plaintiff requests any and all other relief as may be deemed just and equitable to and for her.

Respectfully submitted:



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PLAINTIFFS' COUNSEL

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EXHIBIT 1

ENTERED

March 22, 2016

David J. Bradley, Clerk

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Geneva Reed-Veal,

Plaintiff(s),

v.

Brian Encinia, et al,

Defendant(s).

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CIVIL ACTION NO. H-15-2232

ORDER

Pending before the Court are Defendant Mark Langdon, Lanny Thibodeaux, and Marianne Williams' Motion for Summary Judgment (Doc. # 89) and Defendant Sherry Rochen and Randy Lewis' Motion for Summary Judgment (Doc. # 96). It is hereby

ORDERED that the responses to the foregoing motions are extended to on or before April 22, 2016.

SIGNED at Houston, Texas, this 22 day of March, 2016.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS**

GENEVA REED-VEAL, Individually &)
as Mother & Independent Administrator of the Estate))
of SANDRA BLAND, deceased,))
Plaintiff,))
v.))
BRIAN ENCINIA, et al,))
Defendants.))

No. 4:15-cv-02232
Judge David Hittner

ORDER

Pending before the Court are Defendant, Marc Langdon, Lanny Thibodeaux, Marianne Williams' Motion for Summary Judgment (Doc. # 89) and Defendants, Sherry Rochen and Randy Lewis' Motion for Summary Judgement (Doc. # 96). It is hereby

ORDERED that the responses to foregoing motions are extended to on or before July 29, 2016.

SIGNED at Houston, Texas, this _____ day of April, 2016.

The Honorable **DAVID HITTNER**